

Bruce Berline, Esq.
Law Office of Bruce Berline LLC
Security Title Building
Isa Drive, Capitol Hill
P.O. Box 5682
Saipan, MP 96950
Telephone: (670) 233-3663
Facsimile: (670) 233-5262
Email: bberline@gmail.com

Aaron Halegua
AARON HALEGUA, PLLC
524 Broadway, 11th Floor
New York, New York 10012
Tel: (646) 854-9061
Email: ah@aaronhalegua.com

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

JOSHUA GRAY,

Plaintiff,

v.

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Defendant.

Case No. 19-cv-0008

**PLAINTIFF’S PETITION FOR AN
ORDER TO SHOW CAUSE
AGAINST IPI AND HOWYO CHI**

Hearing date: n/a

Hearing time: n/a

Judge: Hon. Ramona V. Manglona

On October 23, 2023, the Court issued an Order directing that Defendant Imperial Pacific International (CNMI), LLC (“IPI”) “shall ensure and fund the security of IPI’s Personal Property until it is sold by the Limited Receiver and delivered to the buyer. Within fourteen (14) days of the filing of the inventory list by the Receiver, IPI shall file with the Court a sworn declaration and supporting evidence demonstrating its compliance with this provision.” (ECF No. 275 (the “Order”)

¶ 16). Based on IPI’s failure to comply with this Order, Plaintiff Joshua Gray hereby petitions the

1 Court to issue an Order to Show Cause why the Court should not enter an order: (i) holding IPI in
2 contempt; (ii) holding IPI's executive director, Howyo Chi, in contempt; (iii) directing IPI to
3 compensate Plaintiff for the liquor stolen from the Casino; (iv) imposing a daily fine of \$10,000
4 until IPI complies, and incarcerating Mr. Chi if IPI's noncompliance persists; and (v) directing IPI
5 to pay Plaintiff's reasonable attorneys' fees and costs resulting from its disobedience. Plaintiff's
6 petition is supported by a Memorandum of Law, the Declaration of Aaron Halegua, dated April 7,
7 2024, and the Declaration of Christopher Craney, dated April 8, 2024, and all exhibits attached
8 thereto.
9

10
11 Respectfully submitted,

12 /s/

13 _____
Aaron Halegua

14 Bruce Berline

15 Attorneys for Plaintiff
16
17
18
19
20
21
22
23
24
25
26
27
28